

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
INDEMNITY INSURANCE COMPANY :  
OF NORTH AMERICA, :  
Plaintiff, : 07 Civ. 7858 (BSJ)  
- against - : ECF CASE  
: RULE 7.1  
: **DISCLOSURE STATEMENT**  
:-----x

BNSF RAILWAY COMPANY; :  
MAERSK LINE; :  
Defendants.

-----x  
Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel of record for a nongovernmental party discloses that the following are the parent corporations of the party and the publicly held corporations that own 10% or more of the party's stock:

Indemnity Insurance Company of North America is wholly owned (i.e., 100% of stock issued is owned) by INA Holdings Corporation. INA Holdings Corporation is in turn wholly owned by INA Financial Corporation, which is in turn wholly owned by INA Corporation, which is wholly owned by ACE INA Holdings, Inc. 80% of the stock of ACE INA Holdings, Inc. is owned by ACE Prime Holdings, Inc., and the other 20% is owned directly by ACE Limited. ACE Prime Holdings, Inc. is wholly owned by ACE Limited.

Date: New York, New York  
August 7, 2007

*s/*David L. Mazaroli

---

David L. Mazaroli (DM 3929)  
Attorney for Plaintiff  
11 Park Place - Suite 1214  
New York, New York 10007  
Tel.: (212)267-8480  
Fax.: (212)732-7352  
E-mail: [dlm@mazarolilaw.com](mailto:dlm@mazarolilaw.com)  
File No.: 7G-1459